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Cadwalader, Wickersham & Taft LLP 200 Liberty Street, New York, NY 10281 Tel +1 212 504 6000 Fax +1 212 504 6666 www.cadwalader.com

April 13, 2022

VIA ECF

The Honorable Robert W. Lehrburger United States Magistrate Judge United States Court House 500 Pearl Street, Room 1960 New York, NY 10007 USDC SDNY
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Re: Permanens Capital L.P. v. Bruce, Case No. 1:21-cv-10525-JSR-RWL

Dear Judge Lehrburger:

We represent Plaintiff Permanens Capital L.P. ("Plaintiff") in the above-captioned action. Plaintiff and Defendant Jeffery Bruce ("Defendant") have met and conferred and respectfully request the Court adjourn discovery pending this Court's resolution of Defendant's Motion to Dismiss the First Amended Complaint (ECF No. 21) (the "Motion to Dismiss").

If the Court agrees, the Parties will file an amended Civil Case Management Plan and Scheduling Order (the "Amended Plan") no later than thirty (30) days following the Court's entry of an Order resolving Defendant's Motion to Dismiss, with respect to all surviving claims. Also, as part of the Amended Plan, the Parties will provide at least three (3) available dates to the Court for a Case Management Conference on the Amended Plan.

In the alternative, the Parties have provided a joint Case Management Plan and Scheduling Order, filed contemporaneously herewith, for the Court's consideration in the event that our joint request to adjourn discovery were to be denied.

Previously, Plaintiff and Defendant jointly requested an extension and adjournment of the Case Management Plan and Initial Case Management Conference and Initial Case Conference (ECF No. 16), which was granted (ECF No. 17). Both Parties have consented to these requests, as per the enclosed stipulation and proposed order.

Thank you for Your Honor's consideration of this submission.

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The Honorable Robert W. Lehrburger April 13, 2022

Respectfully Submitted,

/s/ Nicholas A. Gravante, Jr. Nicholas A. Gravante, Jr.

cc: All Counsel of Record (Via ECF)

Edward P. Gilbert (egilbert@morrisoncohen.com) Yuliya Neverova (yneverova@morrisoncohen.com)

Enclosure

So Ordered. Discovery stayed pending determination of motion to dismiss.

SO ORDERED:

4/14/2022

HON, ROBERT W. LEHRBURGER UNITED STATES MAGISTRATE JUDGE